

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

United States of America,
Plaintiff,

vs.

(1) ROBINSON JOSUE
SAAVEDRA-CARUCI,
Defendant.

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NO: EP:23-M -03015(1)

**United States' Motion for Continuance and Motion to Detain
Defendant without Bond**

The United States of America, by and through its United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, requests this Honorable Court to briefly continue the detention hearing and detain the Defendant without bond.

As an initial matter, the United States moves for a three-day continuance from the date of initial appearance, pursuant to 18 U.S.C. § 3142(f)(2).

Moreover, the United States moves to detain the Defendant because detention is appropriate given attendance cannot be reasonably assured under 18 U.S.C. § 3142(f), as the Defendant meets the following factors under 18 U.S.C. § 3142(g):

- The weight of the evidence against the Defendant; and
- The Defendant's history and characteristics, which indicate: the Defendant is a foreign national and cannot demonstrate employment, any length of residence in the community, or community ties.

Accordingly, for the foregoing reasons, the United States respectfully requests the Court to briefly continue the detention hearing and to detain the above-named Defendant without bail pending the final outcome of the case.

Respectfully submitted,

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